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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

Kajan Johnson, Clarence Dollaway, and Tristan
 Connelly, on behalf of themselves and all others
 similarly situated,

Plaintiffs,

v.

Zuffa LLC, TKO Operating Company, LLC f/k/a
 Zuffa Parent LLC (d/b/a Ultimate Fighting
 Championship and UFC) and Endeavor Group
 Holdings, Inc.,

Defendants.

No.: 2:21-cv-01189-RFB-BNW

**JOINT STIPULATION TO ADDRESS
 DEFENDANT ZUFFA'S MOTION TO DENY
 CLASS CERTIFICATION OR, IN THE
 ALTERNATIVE, STRIKE CLASS
 ALLEGATIONS**

1 WHEREAS, on April 2, 2025, Defendant Zuffa filed a Motion to Deny Class Certification or, in
2 the Alternative, Strike Class Allegations (“Motion”). (ECF No. 179). As part of the Motion, Defendant
3 Zuffa argued, inter alia, that Plaintiffs’ class definition in the Amended Complaint was improper because
4 a majority of the putative class signed Promotion Agreements that contain arbitration agreements and/or
5 class action waivers.

6 WHEREAS, Plaintiffs have not opposed the Motion but, instead, propose to submit a further
7 amended complaint with a narrowed class definition that excludes any fighter who has signed Promotion
8 Agreements that contain arbitration agreements and/or class action waivers (the “Further Amended
9 Complaint”).
10

11 WHEREAS, the Parties have met and conferred and agree that this Stipulation and the filing of
12 the Further Amended Complaint, will eliminate the need for Plaintiffs to oppose, Zuffa to reply, and for
13 the Court to rule on the Motion. Defendant Zuffa does not waive its right to object to the proposed class
14 in the Further Amended Complaint, nor does Defendant Zuffa agree or concede that the proposed class in
15 the Further Amended Complaint can or should be certified.
16

17 WHEREFORE, Plaintiffs Kajan Johnson, Clarence Dollaway, and Tristan Connelly (“Plaintiffs”)
18 and Defendant Zuffa, LLC (“Defendant,” and collectively with Plaintiffs, the “Parties”), submit this joint
19 stipulation with respect to the Motion (ECF No. 179), to allow for amendment of Plaintiffs’ Amended
20 Complaint (ECF No. 118) to include a narrowed class definition, and also to confirm certain discovery
21 commitments of Defendants. The Parties Stipulate as follows:
22

23 1. Plaintiffs’ Amended Complaint brings claims on behalf of a Class defined as follows:

24 All persons who competed in one or more live professional UFC-promoted MMA bouts
25 taking place or broadcast in the United States from July 1, 2017 until the illicit scheme
26 alleged herein ceases (“Class Period”). The Class excludes all persons who are not residents
or citizens of the United States unless the UFC paid such persons for competing in a bout
fought or broadcast in the United States.

27 Am. Compl. ¶ 37.
28

1 2. Pursuant to the Parties' stipulation, Plaintiffs agree to amend and narrow this Class

2 Definition to bring claims on behalf of the following Class:

3 All persons who competed in one or more live professional UFC-promoted MMA bouts
4 taking place or broadcast in the United States from July 1, 2017 until the scheme alleged
5 herein ceases ("Class Period"). The Class excludes all persons who are not residents or
6 citizens of the United States unless the UFC paid such persons for competing in a bout
fought or broadcast in the United States. The Class also excludes all persons who have
signed a Promotion Agreement or other contract with Zuffa, LLC that contains an
arbitration agreement and/or class-action waiver.

7 3. Plaintiffs agree, with Defendants' consent, to file a Second Amended Complaint
8 incorporating this Class Definition no later than May 9, 2025.

9 4. The Parties agree that the Court need not rule on the Motion and that Defendant Zuffa will
10 withdraw the Motion, without prejudice, once Plaintiffs file a Second Amended
11 Complaint containing the narrowed Class Definition (and no other changes).

12 5. Defendants agree that, notwithstanding Plaintiffs' amendment to their Class Definition,
13 Defendants (a) will produce responsive, proportional, non-privileged documents relating
14 to the negotiation and execution of the arbitration agreements in former putative *Johnson*
15 class members' contracts; and (b) will not withhold otherwise responsive documents from
16 production on the basis that any fighter referenced in the document signed an arbitration
17 agreement or class-action waiver.

18 6. The *foregoing* stipulation does not affect any existing Court deadlines or scheduling
19 previously set in this case.

Dated: April 30, 2025

Respectfully submitted,

/s/ Michael Dell'Angelo

/s/ Christopher S. Yates

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Attorneys for Defendant Zuffa, LLC

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: _____

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on April 30, 2025, via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

Date: April 30, 2025

/s/ Michael Dell'Angelo

Michael Dell'Angelo